



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

FJN:GK/MED  
F.#2018R01809

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 21, 2022

By Email and ECF

Murray E. Singer, Esq.  
14 Vanderventer Ave.  
Suite 147  
Port Washington, NY 11050

Re: United States v. Mustafa Goklu  
Criminal Docket No. 19-386 (PKC)

Dear Mr. Singer:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government writes to provide notice of its intention to call at trial in the above-captioned matter expert witness Senior Special Agent Lilita Infante of the Drug Enforcement Administration ("DEA").

Special Agent Infante has been employed at the DEA for over eight years and is currently assigned to the Miami Field Division Counternarcotic Cyber Investigations Task Force, an enforcement group that focuses exclusively on the investigation of cyber-enabled narcotics trafficking and money laundering violations under Title 18 and 21 of the United States Code. Special Agent Infante has received specialized DEA training regarding the dark web and cryptocurrencies and teaches a cryptocurrency and dark web course to law enforcement, prosecutorial and intelligence agencies at the International Law Enforcement Academies in Africa, Europe, and Central America. Special Agent Infante is expected to testify about the dark web, cryptocurrencies, and the methods by which cryptocurrencies are typically stored, accessed, transferred, and exchanged. Special Agent Infante is also expected to testify about the meaning of certain terminology employed in advertisements posted by the defendant and/or messages that the defendant exchanged via the Signal application.

In connection with Special Agent Infante's anticipated testimony, please find the following enclosed materials:

Description	Bates Numbers
Special Agent Infante's Resume and Bio	LI00001 – LI00002

In connection with Special Agent Infante's testimony, the government refers you to the contents of cellular telephone and laptop recovered from the defendant's residence, produced at MG000146 – MG000147 and MG000271 – MG000696. The government will disclose any additional materials and reports associated with Special Agent Infante's testimony as they become available in advance of trial.

Finally, the government reserves its right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Gillian A. Kassner  
Gillian A. Kassner  
Marietou E. Diouf  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of Court (PKC) (by ECF, without enclosures)